

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO, *ex rel.*  
State Engineer

Plaintiff,

vs.

ROMAN ARAGON, *et al.*,

Defendants.

69cv07941-MV/LFG

RIO CHAMA STREAM SYSTEM  
Section 3: Canjlon Creek

Subfile No. CHCJ-002-0007

**MOTION FOR SUBSTITUTION OF PARTIES**

The plaintiff State of New Mexico, *ex rel.* State Engineer, pursuant to Fed. R. Civ. Pro 25(c), moves the Court to issue its order substituting Kurt Gramoll for defendants Dana J. Drannon and James M. Drannon in subfile CHCB-002-0007, and as grounds therefore plaintiff states:

1. The irrigated lands mapped in subfile CHCJ-002-0007 are now owned by defendant Kurt Gramoll as shown by the deed dated August 4, 2004, filed with the Rio Arriba County Clerk on August 6, 2004, Book 509, Page 375, and the Change of Ownership of a Water Right filed with the Office of the State Engineer on August 20, 2004.

WHEREFORE, the plaintiff State of New Mexico requests the Court to enter its order substituting Kurt Gramoll for defendants Dana J. Drannon and James M. Drannon in subfile CHCJ-002-0007.

Respectfully submitted,

/s/ Ed Newville  
EDWARD G. NEWVILLE

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 21<sup>st</sup> day of April, 2014, I filed the foregoing electronically through the CM/ECF system which caused the parties listed on the electronic service list, as more fully set forth in the Notice of Electronic Filing, to be served via electronic mail, and served the following non-CM/ECF Participants in the manner indicated:

via first class mail, postage prepaid addressed as follows:

Kurt Gramoll  
865 Asp Ave. #212  
Norman, OK 73019

James M. Drannon  
Dana J. Drannon  
2420 5<sup>th</sup> Ave. South  
Great Falls, Montana 59405

/s/ Ed Newville  
EDWARD G. NEWVILLE